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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
 IN AND FOR THE COUNTY OF KING**

CAROLYN WRIGHT, an individual,

Plaintiff,

vs.

WALMART, INC., a foreign profit
 corporation,

Defendants.

NO.

COMPLAINT

COMES NOW Plaintiff, Carolyn Wright, by and through her attorneys, Pellegrino L. Certa and Cheryl J. Farrish, of the Certa Farrish Law Group, and for cause of action against the Defendants, alleges the following:

I. PARTIES

1.1 Plaintiff, CAROLYN WRIGHT, is a an individual currently residing in King County, Washington.

1.2 Defendant, WALMART INC. is a foreign profit corporation licensed to conduct business and doing business in King County, Washington.

1.3 All acts giving rise to this complaint occurred in King County, Washington.

1.4 Venue is proper in King County, Washington.

COMPLAINT FOR NEGLIGENCE- 1

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II. STATEMENT OF FACTS AND CAUSES OF ACTION

2.1 On 05/17/2021, Plaintiff Carolyn Wright was a customer and business invitee at Defendant's store, Walmart, located at 1900 South 314th Street, Federal Way, Washington 98003. Plaintiff Carolyn Wright, while on the premises of the Defendant, slipped and fell due to a dangerous condition on the Defendant's premises.

2.2 As an operator of a grocery establishment, the Defendant owed to persons such as the Plaintiff, a duty to exercise ordinary care for its customers' and employee's safety. This includes the exercise of ordinary care to maintain, in a reasonably safe condition, those portions of the premises that such person is expressly or impliedly invited to use or might reasonably be expected to use. Defendant breached this duty which resulted in the plaintiff being injured.

2.3 As a result of the negligence of Defendant Walmart Inc., the Plaintiff was injured, suffered, and continues to suffer physical injuries and disability, pain, emotional trauma, medical expenses, loss of enjoyment, and other damages, including, but not limited to, property damage.

2.4 Plaintiff's damages include, but are not limited to: physical, psychological and emotional injuries, loss of nurture and guidance, loss of enjoyment of life, loss of wages, medical expenses, out-of-pocket expenses, emotional distress, pain and suffering and other damages that are currently ongoing and which will be proven at trial.

2.5 As a result of Defendant's negligence and breach of its duty to Plaintiff as a business invitee or licensee, Plaintiff has suffered severe and permanent injuries and special and general damages in an amount to be proven at trial.

III. NOTICE

The Plaintiff hereby waives the physician-patient privilege ONLY to the extent required by RCW 5.60.060, as limited by the Plaintiff's constitutional rights of privacy, contractual rights

1 of privacy, and the ethical obligation of physicians and attorneys not to engage in ex parte contact
2 between a treating physician and the patient's legal adversaries.

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4 **IV. PRAYER FOR RELIEF**

5 WHEREFORE, the Plaintiff prays for the following relief against the Defendants:

6 1. For all reasonable and necessary past and future medical expenses, pain and
7 suffering, disfigurement, emotional distress, loss of enjoyment of life, and other special and
8 general damages in an amount to be proven at trial;

9 2. For all costs and disbursements;

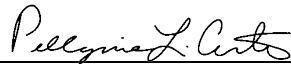
10 3. For reasonable and actual attorneys' fees;

11 4. For pre- and post judgment interests; and

12 5. For such further and other relief as this Court deems just and proper.

13 DATED this 14 day of March, 2022.

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15 CERTA FARRISH LAW GROUP, INC., P.S.

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17 

18 Pellegrino L. Certa, WSBA No. 25903

19 Cheryl J. Farrish, WSBA No.: 41698

20 Attorneys for Plaintiff